

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

RUTH V. BRIGGS

Plaintiff,

v.

TEMPLE UNIVERSITY

Defendant.

Civil Action No.

16-0248

JOINT MOTION FOR EXTENSION OF TIME

Plaintiff Ruth V. Briggs (“Plaintiff”) and Defendant Temple University – of the Commonwealth System of Higher Education (“Defendant”) (collectively, the “Parties”), by and through their undersigned counsel, jointly move this Court for an extension of all deadlines established in the Court’s Order of February 6, 2017 (Doc. No. 23). The Parties respectfully request that the following new deadlines be established, due to scheduling conflicts of counsel and witnesses, which prevent the parties from completing discovery by the current end date (May 15, 2017):

1. All factual discovery shall be completed on or before June 30, 2017;
2. All dispositive motions, if any, shall be filed on or before July 31, 2017; and
3. If the parties do not file any dispositive motions, the parties’ Joint Pretrial Order shall be filed on or before September 1, 2017. If dispositive motions are filed, the parties’ Joint Pretrial Order shall be filed within fourteen (14) days after the Court’s disposition of the dispositive motions.

The Parties seek the relief requested in this motion for the following reasons:

1. Defendant's counsel, Rachel Fendell Satinsky, represents she is scheduled for out-of-state travel during two weeks of May.
2. Defendant's counsel, Richard Harris, represents that he has extensive out-of-state, pre-planned business travel throughout the months of April and May.
3. Plaintiff's counsel, Rahul Munshi, represents that he is scheduled for an arbitration the second week of May, in addition to preparation and travel for *de bene esse* arbitration depositions the prior week.
4. Defendant's counsel further represents that Defendant only retained their services earlier this year, and Defendant is working to produce its final production of electronically stored information.
4. To date, the Parties have exchanged discovery, produced ESI, and negotiated and agreed upon search terms for additional ESI. Defendant's undersigned counsel is becoming familiar with Defendant's and Plaintiff's document production and is committed to finishing discovery quickly and efficiently.
5. To date, the Parties have taken no depositions, although Defendant anticipates deposing Plaintiff and Plaintiff anticipates deposing at least seven (7) witnesses. The depositions of Plaintiff and Plaintiff's supervisor have been scheduled, and the parties are actively working on scheduling the remaining depositions.
6. The parties submit this motion jointly.

Therefore, Plaintiff and Defendant respectfully request that the Court grant this motion and extend the deadlines set forth in this Court's Order of February, 2017 to the new dates specified herein and to enter the proposed order.

s/ Rahul Munshi

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*Attorneys for Plaintiff
Ruth V. Briggs*

Dated: April 10, 2017

/s/ Rachel Fendell Satinsky

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CERTIFICATE OF SERVICE

I, Rachel Fendell Satinsky, hereby certify that on this 10th day of April, 2017, the foregoing document was filed using the Eastern District of Pennsylvania's ECF system, through which this document is available for viewing and downloading, causing a notice of electronic filing to be served upon all counsel of record.

/s/ Rachel Fendell Satinsky

Rachel Fendell Satinsky

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ORDER

AND NOW, this _____ day of _____ 2017, upon joint motion of Plaintiff Ruth V. Briggs (“Plaintiff”) and Defendant Temple University – of the Commonwealth System of Higher Education (“Defendant”) for an extension of time, it is hereby **ORDERED** that the motion is **GRANTED** and the deadlines set by this Court’s Order of February 6, 2017 (Doc. No. 23) are modified as follows:

1. All factual discovery shall be completed on or before June 30, 2017;
2. All dispositive motions, if any, shall be filed on or before July 31, 2017; and
3. If the parties do not file any dispositive motions, the parties’ Joint Pretrial Order shall be filed on or before September 1, 2017. If dispositive motions are filed, the parties’ Joint Pretrial Order shall be filed within fourteen (14) days after the Court’s disposition of the dispositive motions.
4. The Court shall give this case a date certain for trial; and

5. Proposed changes to the foregoing schedule shall be considered by written motion only.

BY THE COURT:

ROBERT F. KELLY
SENIOR JUDGE